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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;  
OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE  
CORREDOR IN SUPPORT OF  
DEFENDANTS UBER TECHNOLOGIES,  
INC.'S AND OTTOMOTTO LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL THEIR OPPOSITION TO  
WAYMO'S REQUEST TO FILE MOTION  
IN LIMINE REGARDING THE STROZ  
FRIEDBERG DUE DILIGENCE**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants Uber Technologies, Inc.’s and  
7 Ottomotto LLC’s Administrative Motion to File Under Seal Their Opposition to Waymo’s Request to  
8 File Motion *in Limine* Regarding the Stroz Friedberg Due Diligence (the “Administrative Motion”).  
9 The Administrative Motion seeks an order sealing highlighted portions of Defendants’ Precis  
10 Opposition Brief (“Uber’s Opposition”), as well as the entirety of Exhibits 2-8 to the Pritt Declaration.

11 3. The highlighted portions of Uber’s Opposition contain or refer to trade secret  
12 information, which Waymo seeks to seal.

13 4. Uber’s Opposition (green highlighted portions) contains, references, and/or describes  
14 Waymo’s asserted trade secrets or information that, from context, tends to disclose Waymo’s asserted  
15 secrets. The information Waymo seeks to seal includes the confidential design and functionality of  
16 Waymo’s proprietary autonomous vehicle system, including its LiDAR designs, which Waymo  
17 maintains as secret. I understand that these trade secrets are maintained as secret by Waymo (Dkt. 25-  
18 47) and that the trade secrets are valuable to Waymo’s business (Dkt. 25-31). The public disclosure of  
19 this information would give Waymo’s competitors access to descriptions of the functionality or  
20 features of Waymo’s autonomous vehicle system. If such information were made public, I understand  
21 that Waymo’s competitive standing would be significantly harmed.

22 5. Waymo’s request to seal is narrowly tailored to those portions of Uber’s Opposition  
23 that merit sealing.

1 I declare under penalty of perjury under the laws of the State of California and the United  
2 States of America that the foregoing is true and correct, and that this declaration was executed in San  
3 Francisco, California, on October 30, 2017.

4 By /s/ Felipe Corredor

5 Felipe Corredor

6 Attorneys for WAYMO LLC

7  
8 **ATTESTATION**

9 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this  
10 document has been obtained from Felipe Corredor.

11  
12 By: /s/ Charles K. Verhoeven

13 Charles K. Verhoeven